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IN THE UNITED STATES DISTRICT COURT **2021 JAN -5 PM 1:47**
FOR THE DISTRICT OF SOUTH CAROLINA

LARRY GOLDEN

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

APPLE INC., et al

SEE ATTACHED LIST

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Complaint for Violation of Civil Rights

(Non-Prisoner Complaint)

Case No. 6:20-cv-04353-BHH-KFM

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in *forma pauperis*.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>LARRY GOLDEN</u>
Street Address	<u>740 WOODRUFF RD, #1102</u>
City and County	<u>GREENVILLE, (SC) / GREENVILLE</u>
State and Zip Code	<u>SOUTH CAROLINA 29607</u>
Telephone Number	<u>864-288-5605</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	<u>SEE ATTACHED LIST</u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
<input type="checkbox"/> Individual capacity	<input type="checkbox"/> Official capacity

Defendant No. 2

Name	<u>SEE ATTACHED LIST</u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>

Telephone Number _____

☐ Individual capacity☐ Official capacity

Defendant No. 3

Name _____

SEE ATTACHED LIST

Job or Title _____

(if known) _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

☐ Individual capacity☐ Official capacity

Defendant No. 4

Name _____

SEE ATTACHED LIST

Job or Title _____

(if known) _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

☐ Individual capacity☐ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

☐ Federal officials (a *Bivens* claim)

☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If

you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

SOUTH CAROLINA AND THROUGHOUT THE TERRITORIES OF
THE UNITED STATES OF AMERICA, TO INCLUDE THE DISTRICT
OF COLUMBIA.

- B. What date and approximate time did the events giving rise to your claim(s) occur?

THE STATUTE OF LIMITATIONS FOR CALCULATING DAMAGES
FOR PATENT INFRINGEMENT GOES BACK SEVEN YEARS.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

THE NAMED DEFENDANTS IN THIS CASE HAS ALLEGEDLY
USED, SOLD AND/OR OFFERED PRODUCTS COVERED IN A
VALID PATENT(S) WITHOUT LICENSE OR AUTHORIZATION
OF THE PATENT OWNER (PLAINTIFF)

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

DAMAGES FROM THE DIRECT, INDIRECT, AND/OR JOINT
INFRINGEMENT OF PLAINTIFF'S '287, '439, '189, '990, '891, AND '497
PATENTS.

THE DEFENDANTS ARE THEREBY LIABLE FOR INFRINGEMENT
OF THE '287, '439, '189, '990, '891, AND '497 PATENTS.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

- 1- A PERMANENT INJUNCTION ENJOINING EACH DEFENDANT, ITS OFFICERS, DIRECTORS, AGENTS, SERVANTS, AFFILIATES, EMPLOYEES, DIVISIONS, BRANCHES, SUBSIDIARIES, AND ALL OTHERS ACTING IN ACTIVE CONCERT OR PRIVITY THEREWITH FROM DIRECT, INDIRECT, AND/OR JOINT INFRINGEMENT OF PLAINTIFF'S PATENTS AS AFORESAID PURSUANT TO 35 U.S.C. § 283.
- 2- ACTUAL AND PUNITIVE DAMAGES DETERMINED BY A JURY IF WE PROCEED TO TRIAL
- 3- PLAINTIFF IS WILLING TO DISCUSS "REASONABLE ROYALTIES" BEFORE PROCEEDING TO TRIAL

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Jan. 1, 2021.

Signature of Plaintiff Larry Golden

Printed Name of Plaintiff LARRY GOLDEN

B. For Attorneys *N/A*

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____

Plaintiff's List of Companies: Case # 6:20-cv-04353-BHH-KFM

Apple Inc.
Attn: Vice President & Chief IP Counsel
1 Infinite Loop
Cupertino, CA 95014
Incorporated Under the Laws of the State of California

Samsung Electronics, USA
Attn: Senior VP & Head of Silicon Valley IP Office, US IP Center
85 Challenger Rd.
Ridgefield Park, New Jersey 07660
Incorporated Under the Laws of the State of New York

LG Electronics, USA, Inc.
Attn: General Counsel (*IP*) at *LG Electronics*
1000 Sylvan Avenue
Englewood Cliffs, New Jersey 07632
Foreign corporation organized and existing under the laws of South Korea

Qualcomm Inc.
Attn: Executive VP, General Counsel Intellectual Property
5775 Morehouse Drive
San Diego, CA 92121
Incorporated Under the Laws of the State of Delaware

Motorola Solutions Inc.
Attn: Lead IP Counsel Motorola Solutions
500 W. Monroe Street, Suite 4400
Chicago, Il 60661-3781
Incorporated Under the Laws of the State of Delaware

Panasonic Corporation
Attn: Chief Intellectual Property Counsel
Two Riverfront Plaza
828 McCarter Hwy
Newark, NJ 07102
Incorporated Under the Laws of the State of Delaware

AT&T Inc.
Attn: Chief Intellectual Property Counsel at AT&T
208 S. Akard St.
Dallas, TX 75202
Incorporated Under the Laws of the State of Delaware

Verizon Corporation Service Group
Attn: SVP & Counsel for Verizon Corporation Service Group
295 N. Maple Ave.
Basking Ridge, NJ 07920
Incorporated Under the Laws of the State of Delaware

Sprint Corporation
Attn: Senior Intellectual Property Counsel at Sprint Corporation
6200 Sprint Parkway
Overland Park, KS
Incorporated Under the Laws of the State of Kansas

T-Mobile USA, Inc.
Attn: Principal Corporation Counsel, IP & Commercial Litigation
12920 SE 38th Street
Bellevue, WA 98006
Incorporated Under the Laws of the State of Delaware

Ford Global Technologies, LLC
Attn: Edward J. Benz III, Chief Intellectual Property Counsel
Fairlane Plaza South, Suite 800
330 Town Center Drive
Dearborn, Michigan 48126
Incorporated Under the Laws of the State of Delaware

Fairway Ford Lincoln of Greenville
Attn: Owner, President and CEO; Intellectual Property
2323 Laurens Road
Greenville, SC 29607
Incorporated Under the Laws of the State of South Carolina

General Motors Company
Attn: Paul Margolis, Counsel, GM Legal Staff
300 Renaissance Center
Detroit, MI 48243
Incorporated Under the Laws of the State of Delaware

Kevin Whitaker Chevrolet
Attn: Owner, President and CEO; Intellectual Property
2320 Laurens Road
Greenville, SC 29607
Incorporated Under the Laws of the State of South Carolina

FCA US LLC
Attn: Chief Executive Officer – Michael Manley
1000 Chrysler Drive
Auburn Hills, MI 48326-2766
Foreign Corporation incorporated under the laws of the Netherlands

Big 'O' Dodge Chrysler Jeep Ram
Attn: Owner, President and CEO; Intellectual Property
2645 Laurens Road
Greenville, SC 29607
Incorporated Under the Laws of the State of South Carolina

STANDARD FOR REVIEW

1. Pursuant to the order of Magistrate Judge Kevin McDonald in United States District Court for the District of South Carolina; filed 12/17/2020; Case No. 6:20-cv-04353-BHH-KFM, Plaintiff is ordered to file “a short and plain statement of the claim showing that the pleader [Plaintiff] is entitled to relief.” Fed. R. Civ. P. 8(a).

2. Plaintiff has attached a copy of the asserted patents as **Exhibits A, B, C, D, E, & F**. The attached patents satisfy the requirement of “enough factual allegations. For example, in *Incom Corp. v. Walt Disney Co.*, No. 2:15-cv-03011-PSG-MRW, Dkt. 39, at *4 (C.D. Cal. Feb. 4, 2016) the Central District of California declined to dismiss a complaint that attached the asserted patent, identified the accused products by name, and generally compared the technology disclosed in the patents to the accused products. The complaint *did not identify any specific asserted claim*, but the court found that: “Plaintiff has stated a plausible claim for direct infringement by specifically identifying Defendants’ products and alleging that they perform the same unique function as Plaintiff’s patented system.” Defendants in this case are liable for infringement of the asserted patents in this case pursuant to 35 U.S.C. § 271.

3. Plaintiff maintains he has additional factual allegations to support his claim in the form of a factual complaint and claim charts that was returned to Plaintiff by order of the Magistrate Judge McDonald for violation of the page limit. Defendants in this case are liable for infringement of the asserted patents in this case pursuant to 35 U.S.C. § 271.

JURISDICTION AND VENUE

4. This is a civil action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1332(a) and 1338(a).

5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and 1400(b). On information and belief, each defendant has purposely transacted business in this judicial district and has committed acts of joint, direct and/or indirect infringement in this judicial district.

6. On information and belief, each defendant is subject to this Court’s specific and general personal jurisdiction, due at least to their substantial business in this forum, including: (A) at least part of their infringing activities alleged herein, and (B) regularly doing or soliciting

business, engaging in others persistent causes of conduct, and/or deriving substantial revenue from goods and services provided to persons and other entities in South Carolina and this judicial district. Each defendant has allegedly used, sold, and/or offered products for sale in South Carolina and is licensed to do business in this state.

7. This Court has specific jurisdiction over each defendant because each has committed acts giving rise to this action and has established minimum contacts within this judicial district such that the exercise of jurisdiction over each defendant would not offend traditional notions of fair play and justice.

RELATED CASES

8. Plaintiff Larry Golden has filed an action of Antitrust Law violations on June 16, 2020, at the United States District Court for the District of South Carolina; Greenville Division (Case No. 6:20-cv-02270) against defendants, Apple Inc. ("Apple"), Samsung Electronics, USA ("Samsung"), LG Electronics, USA, Inc. ("LG"), Qualcomm Inc. ("Qualcomm"), Ford Global Technologies, LLC ("Ford"), General Motors Company ("GM"), and, FCA US LLC ("FCA").

9. Plaintiff Larry Golden has filed an action of patent infringement on September 11, 2019, at the United States District Court for the District of South Carolina; Greenville Division (Case No. 6:19-cv-2557) against defendants, Apple Inc. ("Apple"), Samsung Electronics, USA ("Samsung"), LG Electronics, USA, Inc. ("LG"), Qualcomm Inc. ("Qualcomm"), Motorola Solutions Inc. ("Motorola"), Panasonic Corporation ("Panasonic"), AT&T Inc. ("AT&T"), Verizon Corporation Services Group ("Verizon"), Sprint Corporation ("Sprint"), T-Mobile USA, Inc. ("T-Mobile"), Ford Global Technologies, LLC ("Ford"), Fairway Ford Lincoln of Greenville ("Fairway Ford"), General Motors Company ("GM"), Kevin Whitaker Chevrolet ("Whitaker Chevrolet"), FCA US LLC ("FCA"), and Big O Dodge Chrysler Jeep Ram ("Big O").

THE PARTIES

10. Plaintiff Larry Golden is a citizen of South Carolina and has a principal place of business and residence at 740 Woodruff Road, #1102, Greenville, S.C. 29607.

11. On information and belief, Apple is a California corporation with a principal place of business at 1 Infinite Loop, Cupertino, CA 95014 and does business in this judicial

district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Apple may be served at its principal place of business at 1 Infinite Loop, Cupertino, CA 95014.

12. On information and belief, Samsung is a New Jersey corporation with a principal place of business at 85 Challenger Rd. Ridgefield Park, New Jersey 07660 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Samsung may be served at its principal place of business at 85 Challenger Rd. Ridgefield Park, New Jersey 07660.

13. On information and belief, LG is a New Jersey corporation with a principal place of business at 1000 Sylvan Avenue, Englewood Cliffs, New Jersey 07632 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. LG may be served at its principal place of business at 1000 Sylvan Avenue, Englewood Cliffs, New Jersey 07632.

14. On information and belief, Qualcomm is a California corporation with a principal place of business at 5775 Morehouse Drive, San Diego, CA 92121 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Qualcomm may be served at its principal place of business at 5775 Morehouse Drive, San Diego, CA 92121.

15. On information and belief, Motorola is an Illinois corporation with a principal place of business at 500 W Monroe Street, Suite 4400, Chicago, IL 60661 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Motorola may be served at its principal place of business at 500 W Monroe Street, Suite 4400, Chicago, IL 60661.

16. On information and belief, Panasonic is a New Jersey corporation with a principal place of business at Two Riverfront Plaza, 828 McCarter Hwy, Newark, NJ 07102 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Panasonic may be served at its principal place of business at Two Riverfront Plaza, 828 McCarter Hwy, Newark, NJ 07102.

17. On information and belief, AT&T is a Texas corporation with a principal place of business at 208 S. Akard St. Dallas, TX 75202 and does business in this judicial district by,

among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. AT&T may be served at its principal place of business at 208 S. Akard St. Dallas, TX 75202.

18. On information and belief, Verizon is a New Jersey corporation with a principal place of business at 295 N. Maple Ave. Basking Ridge, NJ 07920 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Verizon may be served at its principal place of business at 295 N. Maple Ave. Basking Ridge, NJ 07920.

19. On information and belief, Sprint is a Kansas corporation with a principal place of business at 6200 Sprint Pkwy. Overland Park, KS 66251 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Sprint may be served at its principal place of business at 6200 Sprint Pkwy. Overland Park, KS 66251.

20. On information and belief, T-Mobile is a Washington corporation with a principal place of business at 12920 SE 38th St. Bellevue, WA 98006 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. T-Mobile may be served at its principal place of business at 12920 SE 38th St. Bellevue, WA 98006.

21. On information and belief, Ford is a Michigan corporation with a principal place of business at Fairlane Plaza South, Suite 800, 330 Town Center Drive, Dearborn, Michigan 48126 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Ford may be served at its principal place of business at Fairlane Plaza South, Suite 800, 330 Town Center Drive, Dearborn, Michigan 48126.

22. On information and belief, Fairway Ford is a South Carolina corporation with a principal place of business at 2323 Laurens Road, Greenville, SC 29607 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Fairway Ford may be served at its principal place of business at 2323 Laurens Road, Greenville, SC.

23. On information and belief, GM is a Michigan corporation with a principal place of business at 300 Renaissance Center, Detroit, MI 48243 and does business in this judicial

district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. GM may be served at its principal place of business at 300 Renaissance Center, Detroit, MI 48243.

24. On information and belief, Whitaker Chevrolet is a South Carolina corporation with a principal place of business at 2320 Laurens Rd. Greenville, SC 29607 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Whitaker Chevrolet may be served at its principal place of business at 2320 Laurens Rd. Greenville, SC 29607.

25. On information and belief, FCA is a Michigan corporation with a principal place of business at 1000 Chrysler Drive, Auburn Hills, MI 48326 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. FCA may be served at its principal place of business at 1000 Chrysler Drive, Auburn Hills, MI 48326.

26. On information and belief, Big O is a South Carolina corporation with a principal place of business at 2645 Laurens Rd. Greenville, SC 29607 and does business in this judicial district by, among other things, committing jointly, directly and/or indirectly the tort of patent infringement giving rise to this complaint. Big O may be served at its principal place of business at 2645 Laurens Rd. Greenville, SC 29607.

COUNT I

(Infringement of the '287 Patent)

27. Golden realleges and incorporates herein the allegations set forth in Paragraphs 1-26.

28. On information and belief, Apple is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing at least claim 5 of the '287 patent. The alleged infringing products are: iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, iPhone 12 series and Apple Watch series 3, 4, & 5.

29. On information and belief, Samsung is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing at least claim 5 of the '287 patent. The alleged infringing products are: Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, Galaxy S20 series & Samsung Gear S3 classic and Galaxy Watch Active2 series.

30. On information and belief, LG is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 5 of the ‘287 patent. The alleged infringing products are: LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, V60, Velvet 5 & LG Watch Sport, LG Watch 7.

31. On information and belief, Qualcomm is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claims 4 & 5 of the ‘287 patent. The alleged infringing products are: Qualcomm’s Snapdragon 5 Series, 6 Series, 7 Series, & 8 Series, Snapdragon 888 Mobile Platform, Snapdragon 865+5G Mobile Platform.

32. On information and belief, Motorola is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 5 of the ‘287 patent. The alleged infringing products are: Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series.

33. On information and belief, Panasonic is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 5 of the ‘287 patent. The alleged infringing products are: TOUGHBOOK 31 Laptop, ELUGA series, Panasonic Power & ToughPad FZ-F1 smartphone.

34. On information and belief, AT&T is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 4 & 5 of the ‘287 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

35. On information and belief, Verizon is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 4 & 5 of the ‘287 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

36. On information and belief, Sprint is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 4 & 5 of the ‘287 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

37. On information and belief, T-Mobile is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 4 & 5 of the ‘287 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

38. On information and belief, Ford is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 1 & 5 of the ‘287 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola’s Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic’s TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

39. On information and belief, Fairway Ford is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 1 & 5 of the ‘287 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola’s Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic’s TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

40. On information and belief, GM is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing at least claim 1 & 5 of the ‘287 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2

series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

41. On information and belief, Whitaker Chevrolet is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing at least claim 1 & 5 of the '287 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

42. On information and belief, FCA US LLC is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing at least claim 1 & 5 of the '287 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

43. On information and belief, Big 'O' Dodge is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing at least claim 1 & 5 of the '287 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7;

Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

COUNT II

(Infringement of the '439 Patent)

44. Golden realleges and incorporates herein the allegations set forth in Paragraphs 1-43.

45. On information and belief, Apple is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 13-15, 22 & 23 of the '439 patent. The alleged infringing products are: iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, iPhone 12 series and Apple Watch series 3, 4, & 5.

46. On information and belief, Samsung is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 13-15, 22 & 23 of the '439 patent. The alleged infringing products are: Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, Galaxy S20 series & Samsung Gear S3 classic and Galaxy Watch Active2 series.

47. On information and belief, LG is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 13-15, 22 & 23 of the '439 patent. The alleged infringing products are: LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, V60, Velvet 5 & LG Watch Sport, LG Watch 7.

48. On information and belief, Qualcomm is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 13-15, 22 & 23 of the '439 patent. The alleged infringing products are: Qualcomm's Snapdragon 5 Series, 6 Series, 7 Series, & 8 Series, Snapdragon 888 Mobile Platform, Snapdragon 865+5G Mobile Platform.

49. On information and belief, Motorola is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 13-15, 22 & 23 of the '439 patent. The alleged infringing products are: Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series.

50. On information and belief, Panasonic is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 13-15, 22 & 23 of the '439 patent. The alleged

infringing products are: TOUGHBOOK 31 Laptop, ELUGA series, Panasonic Power & ToughPad FZ-F1 smartphone.

51. On information and belief, AT&T is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 13-15, 22 & 23 of the ‘439 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

52. On information and belief, Verizon is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 13-15, 22 & 23 of the ‘439 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

53. On information and belief, Sprint is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 13-15, 22 & 23 of the ‘439 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

54. On information and belief, T-Mobile is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 13-15, 22 & 23 of the ‘439 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

55. On information and belief, Ford is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 13-15, 22 & 23 of the ‘439 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola’s Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic’s

TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

56. On information and belief, Fairway Ford is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 13-15, 22 & 23 of the ‘439 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola’s Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic’s TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

57. On information and belief, GM is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 13-15, 22 & 23 of the ‘439 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola’s Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic’s TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

58. On information and belief, Whitaker Chevrolet is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 13-15, 22 & 23 of the ‘439 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola’s Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series;

and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

59. On information and belief, FCA US LLC is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 13-15, 22 & 23 of the '439 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

60. On information and belief, Big 'O' Dodge is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 13-15, 22 & 23 of the '439 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

COUNT III

(Infringement of the '189 Patent)

61. Golden realleges and incorporates herein the allegations set forth in Paragraphs 1-60.

62. On information and belief, Apple is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 1, 2 & 3 of the '189 patent. The alleged infringing products are: iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, iPhone 12 series and Apple Watch series 3, 4, & 5.

63. On information and belief, Samsung is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 1, 2 & 3 of the ‘189 patent. The alleged infringing products are: Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, Galaxy S20 series & Samsung Gear S3 classic and Galaxy Watch Active2 series.

64. On information and belief, LG is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 1, 2 & 3 of the ‘189 patent. The alleged infringing products are: LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, V60, Velvet 5 & LG Watch Sport, LG Watch 7.

65. On information and belief, Qualcomm is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 1, 2 & 3 of the ‘189 patent. The alleged infringing products are: Qualcomm’s Snapdragon 5 Series, 6 Series, 7 Series, & 8 Series, Snapdragon 888 Mobile Platform, Snapdragon 865+5G Mobile Platform.

66. On information and belief, Motorola is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 1, 2 & 3 of the ‘189 patent. The alleged infringing products are: Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series.

67. On information and belief, Panasonic is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 1, 2 & 3 of the ‘189 patent. The alleged infringing products are: TOUGHBOOK 31 Laptop, ELUGA series, Panasonic Power & ToughPad FZ-F1 smartphone.

68. On information and belief, AT&T is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 1, 2 & 3 of the ‘189 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

69. On information and belief, Verizon is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 1, 2 & 3 of the ‘189 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

70. On information and belief, Sprint is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing claims 1, 2 & 3 of the ‘189 patent. The alleged infringing

products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic's locked/unlocked smartphones, laptops, tablets, or smartwatches.

71. On information and belief, T-Mobile is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 1, 2 & 3 of the '189 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic's locked/unlocked smartphones, laptops, tablets, or smartwatches.

72. On information and belief, Ford is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 1, 2 & 3 of the '189 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

73. On information and belief, Fairway Ford is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 1, 2 & 3 of the '189 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

74. On information and belief, GM is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 1, 2 & 3 of the '189 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series,

iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

75. On information and belief, Whitaker Chevrolet is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 1, 2 & 3 of the '189 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

76. On information and belief, FCA US LLC is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 1, 2 & 3 of the '189 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

77. On information and belief, Big 'O' Dodge is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing claims 1, 2 & 3 of the '189 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series,

& Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

COUNT IV

(Infringement of the '990 Patent)

78. Golden realleges and incorporates herein the allegations set forth in Paragraphs 1-77.

79. On information and belief, Apple is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990 patent. The alleged infringing products are: iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, iPhone 12 series and Apple Watch series 3, 4, & 5.

80. On information and belief, Samsung is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990 patent. The alleged infringing products are: Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, Galaxy S20 series & Samsung Gear S3 classic and Galaxy Watch Active2 series.

81. On information and belief, LG is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990 patent. The alleged infringing products are: LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, V60, Velvet 5 & LG Watch Sport, LG Watch 7.

82. On information and belief, Qualcomm is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990

patent. The alleged infringing products are: Qualcomm's Snapdragon 5 Series, 6 Series, 7 Series, & 8 Series, Snapdragon 888 Mobile Platform, Snapdragon 865+5G Mobile Platform.

83. On information and belief, Motorola is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990 patent. The alleged infringing products are: Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series.

84. On information and belief, Panasonic is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990 patent. The alleged infringing products are: TOUGHBOOK 31 Laptop, ELUGA series, Panasonic Power & ToughPad FZ-F1 smartphone.

85. On information and belief, AT&T is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic's locked/unlocked smartphones, laptops, tablets, or smartwatches.

86. On information and belief, Verizon is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic's locked/unlocked smartphones, laptops, tablets, or smartwatches.

87. On information and belief, Sprint is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the '990 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic's locked/unlocked smartphones, laptops, tablets, or smartwatches.

88. On information and belief, T-Mobile is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing independent claim 125, and/or dependent claims 12, 16, 18, 20, 21, 22, 25, 28, 30, 39, 41, 55, 78, 79, 104, 108, 113, 118, 126, 132, 134 & 135 of the ‘990 patent. The alleged infringing products are: *using to generate a profit for service, offering for sale, selling, and/or importing* the computerized communications devices of Apple, Samsung, LG, Motorola, or Panasonic’s locked/unlocked smartphones, laptops, tablets, or smartwatches.

89. On information and belief, Ford is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing independent claim 125 of the ‘990 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola’s Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic’s TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

90. On information and belief, Fairway Ford is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing independent claim 125 of the ‘990 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola’s Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic’s TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

91. On information and belief, GM is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing independent claim 125 of the ‘990 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple’s iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung’s Galaxy S10 series, Galaxy Note 8, 9, & 10 series,

Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

92. On information and belief, Whitaker Chevrolet is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125 of the '990 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

93. On information and belief, FCA US LLC is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125 of the '990 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

94. On information and belief, Big 'O' Dodge is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 125 of the '990 patent. The alleged infringing products are: *using, with its vehicles the alleged infringing devices* of Apple's iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, & Apple Watch series 3, 4, & 5; Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, & Samsung Gear S3 classic and Galaxy Watch

Active2 series; LG's V20, V30, V35, V50, LG G6, LG G7, LG G8, LG & Watch Sport, LG Watch 7; Motorola's Moto Z2, Z3, & Z4 series, Motorola One series, & Moto G7 series; and, Panasonic's TOUGHBOOK 31 Laptop, ELUGA C series, Panasonic Power & ToughPad FZ-F1 smartphone communication devices.

COUNT V

(Infringement of the '891 Patent)

95. Golden realleges and incorporates herein the allegations set forth in Paragraphs 1-94.

96. On information and belief, Ford is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claims 11, 23, & 44 and/or dependent claims 47, 48, 49, 50, 51 & 53 of the '891 patent. The alleged infringing products are: pre-programmed stall, stop, or vehicle slowdown systems (PSSVSS) that includes, without limitation a PSSVSS for an autonomous or driverless vehicle; a PSSVSS for vehicle pre-crash forward acceleration; a PSSVSS for vehicle pre-crash reverse acceleration; a PSSVSS for vehicle lane departure; a PSSVSS for vehicle stabilization; a PSSVSS for vehicle unintended acceleration; a PSSVSS for vehicle moved outside a designated perimeter; a PSSVSS for traffic sign recognition; a PSSVSS for intelligent speed limiter, or, a PSSVSS for vehicle adapted cruise control.

97. On information and belief, Fairway Ford is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claims 11, 23, & 44 and/or dependent claims 47, 48, 49, 50, 51 & 53 of the '891 patent. The alleged infringing products are: pre-programmed stall, stop, or vehicle slowdown systems (PSSVSS) that includes, without limitation a PSSVSS for an autonomous or driverless vehicle; a PSSVSS for vehicle pre-crash forward acceleration; a PSSVSS for vehicle pre-crash reverse acceleration; a PSSVSS for vehicle lane departure; a PSSVSS for vehicle stabilization; a PSSVSS for vehicle unintended acceleration; a PSSVSS for vehicle moved outside a designated perimeter; a PSSVSS for traffic sign recognition; a PSSVSS for intelligent speed limiter, or, a PSSVSS for vehicle adapted cruise control.

98. On information and belief, GM is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claims 11, 23, & 44 and/or dependent claims 47, 48, 49, 50, 51 & 53 of the '891 patent. The alleged infringing products are: pre-programmed

stall, stop, or vehicle slowdown systems (PSSVSS) that includes, without limitation a PSSVSS for an autonomous or driverless vehicle; a PSSVSS for vehicle pre-crash forward acceleration; a PSSVSS for vehicle pre-crash reverse acceleration; a PSSVSS for vehicle lane departure; a PSSVSS for vehicle stabilization; a PSSVSS for vehicle unintended acceleration; a PSSVSS for vehicle moved outside a designated perimeter; or, a PSSVSS for vehicle adapted cruise control.

99. On information and belief, GM is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 11 and/or dependent claims 12, 13, 14, 15, 16, 17, 18 & 19 of the '891 patent. The alleged infringing products are: GM/OnStar's STOLEN VEHICLE SYSTEM) including without limitation the CMDC device remote means of stalling, stopping, or slowing a vehicle by way of cellular, satellite, radio-frequency, internet, electromagnetic pulse, electrostatic discharge, or microwave beam.

100. On information and belief, Whitaker Chevrolet is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claims 11, 23, & 44 and/or dependent claims 47, 48, 49, 50, 51 & 53 of the '891 patent. The alleged infringing products are: pre-programmed stall, stop, or vehicle slowdown systems (PSSVSS) that includes, without limitation a PSSVSS for an autonomous or driverless vehicle; a PSSVSS for vehicle pre-crash forward acceleration; a PSSVSS for vehicle pre-crash reverse acceleration; a PSSVSS for vehicle lane departure; a PSSVSS for vehicle stabilization; a PSSVSS for vehicle unintended acceleration; a PSSVSS for vehicle moved outside a designated perimeter; or, a PSSVSS for vehicle adapted cruise control.

101. On information and belief, Whitaker Chevrolet is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 11 and/or dependent claims 12, 13, 14, 15, 16, 17, 18 & 19 of the '891 patent. The alleged infringing products are: GM/OnStar's STOLEN VEHICLE SYSTEM) including without limitation the CMDC device remote means of stalling, stopping, or slowing a vehicle by way of cellular, satellite, radio-frequency, internet, electromagnetic pulse, electrostatic discharge, or microwave beam.

102. On information and belief, FCA US LLC is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claims 11, 23, & 44 and/or dependent claims 47, 48, 49, 50, 51 & 53 of the '891 patent. The alleged infringing products are: pre-programmed stall, stop, or vehicle slowdown systems (PSSVSS) that includes, without limitation a PSSVSS for an autonomous or driverless vehicle; a PSSVSS for vehicle pre-crash

forward acceleration; a PSSVSS for vehicle pre-crash reverse acceleration; a PSSVSS for vehicle lane departure; a PSSVSS for vehicle stabilization; a PSSVSS for vehicle unintended acceleration; a PSSVSS for vehicle moved outside a designated perimeter; a PSSVSS for traffic sign recognition; a PSSVSS for intelligent speed limiter, or, a PSSVSS for vehicle adapted cruise control.

103. On information and belief, Big 'O' Dodge is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claims 11, 23, & 44 and/or dependent claims 47, 48, 49, 50, 51 & 53 of the '891 patent. The alleged infringing products are: pre-programmed stall, stop, or vehicle slowdown systems (PSSVSS) that includes, without limitation a PSSVSS for an autonomous or driverless vehicle; a PSSVSS for vehicle pre-crash forward acceleration; a PSSVSS for vehicle pre-crash reverse acceleration; a PSSVSS for vehicle lane departure; a PSSVSS for vehicle stabilization; a PSSVSS for vehicle unintended acceleration; a PSSVSS for vehicle moved outside a designated perimeter; a PSSVSS for traffic sign recognition; a PSSVSS for intelligent speed limiter, or, a PSSVSS for vehicle adapted cruise control.

COUNT VI

(Infringement of the '497 Patent)

104. Golden realleges and incorporates herein the allegations set forth in Paragraphs 1-103.

105. On information and belief, Apple is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 1, and/or dependent claims 2-6 of the '497 patent. The alleged infringing products are: iPhone 7 series, iPhone 8 series, iPhone X series, iPhone XS series, iPhone XR series, iPhone 11 series, iPhone 12 series and Apple Watch series 3, 4, & 5.

106. On information and belief, Samsung is jointly, directly, indirectly and/or under the 'doctrine of equivalents', infringing independent claim 1, and/or dependent claims 2-6 of the '497 patent. The alleged infringing products are: Samsung's Galaxy S10 series, Galaxy Note 8, 9, & 10 series, Galaxy Note 8S, 9S, & 10S series, Galaxy S20 series & Samsung Gear S3 classic and Galaxy Watch Active2 series.

107. On information and belief, LG is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing independent claim 1, and/or dependent claims 2-6 of the ‘497 patent. The alleged infringing products are: LG’s V20, V30, V35, V50, LG G6, LG G7, LG G8, V60, Velvet 5 & LG Watch Sport, LG Watch 7.

108. On information and belief, Qualcomm is jointly, directly, indirectly and/or under the ‘doctrine of equivalents’, infringing independent claim 1, and/or dependent claims 2-6 of the ‘497 patent. The alleged infringing products are: Qualcomm’s Snapdragon 5 Series, 6 Series, 7 Series, & 8 Series, Snapdragon 888 Mobile Platform, Snapdragon 865+5G Mobile Platform.

PRAYER FOR RELIEF

Wherefore, Golden respectfully requests that this Court enter:

A. A judgment in favor of Golden that each defendant has infringed at least one claim of the ‘287 Patent, the ‘439 Patent, the 189 Patent, the ‘990 Patent, the ‘891 Patent and the ‘497 Patent as aforesaid;

B. A permanent injunction enjoining each defendant, its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents and all others acting in active concert or privity therewith from direct, indirect and/or joint infringement of the ‘287, ‘439, ‘189, ‘990, ‘891, and ‘497 patents as aforesaid pursuant to 35 U.S.C. § 283;

C. A judgment and order requiring each defendant to pay Golden its damages with pre- and post-judgment interest thereon pursuant to 35 U.S.C. § 284;

D. As set forth in Golden’s preliminary infringement contentions that the Defendants in this case are making, using, offering for sale, selling and/or importing the aforementioned alleged infringing devices that have at a minimum, directly infringed the ‘287, ‘439, ‘189, ‘990, ‘891, and ‘497 patents. The Defendants are thereby liable for infringement of the ‘287, ‘439, ‘189, ‘990, ‘891, and ‘497 patents pursuant to 35 U.S.C. § 271. The Defendants have caused damage to Golden, which infringement and damage will continue unless and until the Defendants are enjoined.

E. Any and all further relief to which the Court may deem Golden entitled.

DEMAND FOR JURY TRIAL

Golden requests a trial by jury on all issues so triable by right pursuant to Fed. R. Civ. P.
38. A right guaranteed under the Seventh Amendment of the Constitution.

Respectfully submitted,

S/  Date: 01 /04 /2021

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